

## **EXHIBIT 26**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ESTHER WILDER,

Plaintiff,

-against-

SARAH HOILAND,

Defendant.

Civil Action No.

1:22-cv-01254-PKC

**RESPONSES TO PLAINTIFF'S  
FIRST SET OF REQUESTS FOR  
ADMISSION TO DEFENDANT**

**REQUEST NO. 1**

Admit that You had access to the Copyrighted Text prior to February 2019.

**RESPONSE TO REQUEST NO. 1**

Objects to the definition of “Copyrighted Text” because it is not clear whether all or a portion of the text at issue is “original text.” Dr. Hoiland admits that, from the outset of her involvement with the Numeracy Infusion for College Educators Project (the “NICE Project”), she had access to the written materials that supported the NICE Project, which included the text from Unit 7H (“Unit 7H”).

**REQUEST NO. 2**

Admit that You copied the Copyrighted Text in the CCCLA Presentation.

**RESPONSE TO REQUEST NO. 2**

Objects to the definition of “Copyrighted Text” because it is not clear whether all or a portion of the text at issue is “original text.” Objects to defining the slides from Dr. Hoiland’s presentation (the “Slides”) as the “CCCLA Presentation” because the Slides were aids for Dr. Hoiland’s actual presentation at the Community College Conference on Learning Assessment (hereinafter and as defined in the Answer, the “CCCLA Presentation”). Denied. Dr. Hoiland admits that portions of Unit 7H are included in the Slides.

**REQUEST NO. 3**

Admit that You distributed copies of the Copyrighted Text to the public by including it in the CCCLA Presentation.

**RESPONSE TO REQUEST NO. 3**

Objects to the definition of “Copyrighted Text” because it is not clear whether all or a portion of the text at issue is “original text.” Objects to defining the slides from Dr. Hoiland’s presentation (the “Slides”) as the “CCCLA Presentation.” *See* Response to Request No. 2. Denied. Objects to “public” as a vague descriptor. Dr. Hoiland admits that the Slides were available to registered attendees of the CCCLA Conference and shown during the CCCLA Presentation.

**REQUEST NO. 4**

Admit that the Copyrighted Text is included on slide number 9 of the CCCLA Presentation.

**RESPONSE TO REQUEST NO. 4**

Denied. Dr. Hoiland admits that portions of Unit 7H appear on Slide No. 9.

**REQUEST NO. 70**

Admit that You have identified Your participation in the Valencia College event where you presented the CCCLA Presentation on at least one application for a grant.

**REQUEST NO. 71**

Admit that You have identified Your participation in the Valencia College event where you presented the CCCLA Presentation on at least one application for academic recognition.

**RESPONSES TO REQUESTS NOS. 61-71**

Objects to Request Nos. 61-71 on the grounds that they are improper efforts to use Requests for Admission as discovery devices; that they are not relevant to the claims or defenses of either party to this action; and that they are designed solely to harass and annoy Dr. Hoiland.

Dated:

08/19/22



Sarah Hoiland  
Pro Se Counsel  
79 Hamilton Pl #10  
New York, NY 10031

Prepared with the assistance of counsel admitted in the Southern District of New York.